

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

In re: PHARMACEUTICAL INDUSTRY)	
AVERAGE WHOLESAL PRICE)	
LITIGATION)	MDL No. 1456
_____)	Civil Action No. 01-12257-PBS
)	
THIS DOCUMENT RELATES TO:)	Hon. Patti Saris
)	
<i>United States of America, ex rel. Ven-a-Care</i>)	
<i>of the Florida Keys, Inc., v. Abbott</i>)	
<i>Laboratories, Inc., and Hospira, Inc.</i>)	
CIVIL ACTION NO. 06-11337-PBS)	

[PROPOSED] ORDER

Upon consideration of the United States' and Relator's Memorandum in Support of Their Motion for a Protective Order, Abbott Laboratories, Inc.'s opposition thereto, and the Plaintiffs' reply in support, IT IS HEREBY ORDERED THAT,

1. The Plaintiffs' Motion is GRANTED;
2. Plaintiffs' proposed Protective Order, attached to Plaintiffs' Memorandum as Exhibit 1, is hereby ENTERED, and shall be applicable to any future cases in the multidistrict litigation referred to as: *In re: Pharmaceutical Industry Average Wholesale Price Litigation*, MDL No. 1456, in which the United States is a party.

IT IS SO ORDERED,

This _____ day of _____, 200_.

PATTI B. SARIS
UNITED STATES DISTRICT JUDGE

CERTIFICATION

The undersigned counsel certifies pursuant to LR 7.1(a)(2) that she and the Relator's counsel, James J. Breen, have conferred with counsel for the Defendant Abbott Laboratories, Inc. on the issues raised in this motion and have not been able to reach agreement.

Dated: September 15, 2006

/s/ Renée Brooker
Renée Brooker

CERTIFICATE OF SERVICE

I hereby certify that I have this day caused an electronic copy of the above **UNITED STATES' AND RELATOR'S PROPOSED ORDER** to be served on all counsel of record via electronic service pursuant to Paragraph 11 of Case Management Order No. 2 by sending a copy to LexisNexis File & Serve for posting and notification to all parties.

Dated: September 15, 2006

/s/ Renée Brooker
Renée Brooker